

	Title:	Osage Municipal Utilities Customer Proprietary Network Information Program
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Osage Municipal Utilities, (Referred to as OMU throughout this document), has implemented the following procedures to ensure that is compliant with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U, Customer Proprietary Network Information (CPNI), § 64.201 through § 64.211.

Compliance Officer

The OMU Board of Directors has appointed Brandon Halsne as the organization's Compliance Office. The compliance officer is responsible for ensuring that the organization and its employees are following all CPNI rules. The compliance officer is also the point of contact for anyone, internally or externally, with questions about CPNI.

Employee Training

The Compliance Officer arranges for the training of all employees on an annual basis, and if needed, more frequently. Any new employee will be trained when hired by the company. The training includes, but is not limited to, when employees are authorized to use CPNI, and what authentication methods the company is using. The training can differ based on if the employee has access to CPNI.

After the training, all employees are required to sign a certification that they have received training on the CPNI rules, that they understand the OMU's procedures for protecting CPNI, and they understand the organization's disciplinary process for improper use of CPNI. Employees will be provided with a copy of the OMU's CPNI program and rules during initial training, and when any changes are made. Employee's may also request a copy of the program and rules at any time.

Employees are instructed that if they ever have any questions regarding the use of CPNI, or they are aware of violations of CPNI by anyone, they should contact the compliance officer immediately.

Disciplinary Process

OMU has established disciplinary procedures as described in the Employee Handbook, Section V. The disciplinary action will be based on the type and severity of the violation and could include any combination of the following:

- Retraining on the CPNI program and rules
- Notation in the employee's file
- Formal Written Reprimand
- Suspension or termination

Customer Notification and Request for Approval to Use CPNI

OMU has not provided notification to its customers and has not asked for approval to use CPNI because it only uses CPNI in those instances where it is permissible to use CPNI without customer approval. It does not share the customer's information with any joint venture partner, independent contractor, or any other third party. For marketing purposes, OMU may use mass marketing to all customers, or use CPNI to market to only service offerings among the categories of service to which the customer already subscribes.

If OMU receives a call from a customer who wants to discuss services outside of the customer's existing service offerings, the customer service representative uses the oral notification for one-time use of CPNI to obtain approval for the duration of the call only.

Marketing Campaigns

If OMU uses CPNI for any marketing campaign, the Compliance Officer will review the campaign and all materials to ensure it follows CPNI rules.

The company will retain records of any marketing campaigns that use CPNI for no less than 2 years.

Authentication

OMU will not disclose any CPNI until the customer has been appropriately authenticated as follows:

- In-Office Visit – The customer must provide a valid photo ID matching the customer's account information.
- Customer-initiated call – The customer must provide his/her pre-established password/security question, and must be listed as a contact on the account. If the customer cannot provide the password/answer the question, the customer must be re-authenticated, without using readily available biographical or account information, and a new password/security question must be established.

Notification of Account Changes

OMU must promptly notify customers whenever a change is made to any of the following:

- Account password/security question
- Address of Record

The notification to the customer will be made either by a company originated call to the number of record, or sent to the address of record (postal or email).

OMU customer service representatives will make a not in the customer contract tracking section of the NISC software.

Notification of Breaches

Employee's will immediately notify the Compliance Office of any indication of a breach. If it is determined that a breach has occurred, the Compliance Officer will do the following:

- Notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) as soon as practical, but in no event later than 7 business days after determination of the breach. The notification will be via the FCC link at <http://www.fcc.gov/eb/cpni>
- Notify customers only after 7 full business days have passed since the notification to the USSS and FBI, unless the USSS or FBI have requested and extension.
- If there is an urgent need to notify affected customers or the public sooner to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency
- Maintain a record of the breach, the notifications made to the USSS and FBI, and the notifications made to the customers. The record should include dates of discovery and notification, a detailed description of the CPNI that was involved, and the circumstances of the breach.
- Include a summary of the breach in the annual compliance certificate filed with the FCC.

Annual Certification

The Compliance Officer will file a Compliance Certification with the FCC by March 1 of each year, for data pertaining to the previous calendar year.

Record Retention

OMU retains all information regarding CPNI in electronic format on the OMU file server for the following time periods:

- CPNI notification and records of approval – two years
- Marketing campaigns – two years
- Breaches – two years
- Annual Certification – five years
- Employee training certification – two years
- All other information – two years